

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

IN THE MATTER OF THE SEARCH OF
ADRIENNE ROSSE
FOR DNA SAMPLE

Case No. 24-SW-212

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR A SEARCH WARRANT**

I, Susan Link, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for Deoxyribonucleic Acid (DNA) samples of Adrienne Rosse (ROSSE), social security number ending in 4171, currently residing at 12148 Brooks Village Drive, Arlington, Tennessee 38002.

2. I am a United States Postal Inspector (INSP) assigned to the United States Postal Inspection Service (USPIS), Atlanta Division, Memphis Domicile. I have been employed by the USPIS since June 11, 2005. During that time, I have investigated numerous types of criminal activity to include white collar related investigations, threatening mailings and child pornography. My current responsibilities primarily involve the investigation of what are commonly referred to as "white collar crimes" and include the investigations of federal identity theft, mail, wire, and bank fraud (Title 18, Unites States Code, Sections 1028A, 1341, 1343, and 1344).

3. The facts set forth in this affidavit are based upon information learned during the course of the investigation of ROSSE. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth each and every fact known to the government. Based on my training and experience and the facts as set forth in this

affidavit, there is probable cause to believe that ROSSE has committed a violation of 18 U.S.C. § 2261A(2)(B). cyberstalking.

II. FACTS ESTABLISHING PROBABLE CAUSE

4. Since August 2023, the USPIS and the Shelby County Sheriff's Office have been investigating a stalking investigation involving an Assistant District Attorney, for the remainder "VICTIM".

5. In August 2023 the United States Attorney's Office received a complaint from VICTIM's attorney, advising an unknown person mailed a twenty-page letter to:

Jonathan Skrmetti, Tennessee Attorney General,

Steve Mulroy, the Shelby County District Attorney,

The Board of Professional Responsibility,

The Memphis Bar Association,

and reporters at four local television stations.

6. This letter alleged VICTIM was involved in "producing, performing, disseminating, and selling illegal pornography." The letter also contained numerous photos of a woman in various sexual acts. Some of pictures had photos of VICTIM's face imposed on them.

7. I recovered five of the mailings. I noted that all five were sent in red business sized envelopes, with four United States Postal Service (USPS) Forever stamps. Each envelope had two florescent green address labels affixed to it. One label provided the sender information, and the other label provided the addressee information. In each of the mailings the suspect swapped the sender and addressee information used on another envelope. As an example, the envelope addressed to the Memphis Bar Association showed the sender as the Board of

Professional Responsibility. The letter addressed to the Board of Professional Responsibility showed the sender as the Memphis Bar Association.

8. I reviewed a copy of the letter. In the letter the author advised, "I have recently discovered compelling evidence (photos videos social media and website accounts) that clearly identify ADA [VICTIM] in the production, performance, dissemination and online sale of her pornography, and the online sale and distribution of her soiled undergarments... This discovery raises significant ethical concerns and bring into question the individual's fitness to serve as an assistant district attorney, whose role is to uphold justice and maintain the highest standards of professional conduct."

9. On August 24, 2023, I contacted VICTIM. VICTIM advised she had identified several possible suspects related to the mailings. VICTIM reported she felt ROSSE, and her husband Charles Rosse ("CHARLES") were possible suspects. VICTIM explained that in April 2023 VICTIM tried CHARLES in a rape case. VICTIM said the trial ended in a hung jury. VICTIM reported that about three weeks prior to these letters being sent out VICTIM had contacted CHARLES' attorney, Joseph McClusky, with an offer for CHARLES to consider. VICTIM noted if CHARLES did not accept the offer VICTIM planned to re-try the case. VICTIM said McClusky, CHARLES' attorney, told VICTIM the couple were very upset about the offer.

10. VICTIM also reported ROSSE's family, who also are the family of the alleged rape victim, had previously told VICTIM that the couple "did something very similar to a family member when she was in the Army." VICTIM said she understood that based on the letter, ROSSE's family member was kicked out of the ARMY.

11. On August 29, 2023, I made contact with Cristie Pellegrin, ROSSE's mother, regarding the allegations of similar conduct by ROSSE and CHARLES.

12. Pellegrin turned over a Priority Express Mail envelope that showed it had been mailed from the Arlington Post Office on March 9, 2020. The label was addressed to Cristie Pellegrin at her address in Arlington, TN 38002. The label showed the sender as Rob Manuel at his address in Bartlett, TN 38134. Rob Manuel is Pellegrin's ex-husband and ROSSE's biological father. Pellegrin showed me a text message in which Manuel wrote: "Well we both know [ROSSE] is the creator, since [ROSSE's relative] confirmed that the pics were made on the iPhone [CHARLES] stole and copied to his computer."

13. Inside this envelope was a second white envelope that again had an address label showing Pellegrin as the addressee and Manel as the sender, exactly like the information provided on the exterior envelope.

14. The contents of the interior envelope included three pages of pornographic photos of ROSSE's relative and photos of her using drugs, as well as screenshots of sexually explicit messages. It also contained two DVDs and a two-page list of the DVDs contents, which included titles suggesting the contents contained pornographic content of ROSSE's relative.

15. Pellegrin had a screenshot of another envelope that was sent March 9, 2020, from Arlington, Tennessee. This envelope showed it was sent from Pellegrin to Manuel at his address in Bartlett, TN. Pellegrin reported that the contents of this second Priority Mail Express were the same as the envelope Pellegrin had received. Pellegrin denied sending the letter.

16. Pellegrin also included a partial copy of a letter, dated April 19, 2020, addressed to RTC Commanding Officer, Captain Erik Thors, Ship 5, Recruit Training Command, 3610 Illinois Street, Great Lakes IL, 60088-3118 and Special Agent Rod Baldwin Deputy Director of

Operations. Naval Criminal Investigative Service, 27130 Telegraph Road, Quantico, VA 22134. The letter accused ROSSE's relative of fraudulently enlisting in the Navy and said that enclosed with the letter were contents including the same material that was sent to Pellegrin.

17. On November 15, 2023, VICTIM reported she had been notified that an additional letter had been sent out. VICTIM advised the letter had been sent to defense attorneys in the Memphis area.

18. I recovered all six copies of the letters. All of the envelopes were mustard colored business sized envelopes. Each envelope showed the sender and the addressee as the same person. As an example, the address labels for the addressee and sender of one of the envelopes both contained "Jason Matthews, Jason Matthews Law, 242 Poplar Ave., Memphis, TN 38103." The address labels on all of the envelopes were florescent orange and all were mailed using four United States Postal Service Forever stamps.

19. The letter inside the envelope was addressed as follows:

To:

Attorney Andre Wharton on behalf of your client John Champion

Attorney Jason Matthews on behalf of your client Erick Woods

Attorney Charles B. Walker on behalf of your client Chrisotpher Lasane

Attorney Joseph Andre McClusky on behalf of your client Perry Luellen

Attorney Eric Mogy on behalf of your client Randy Thomas Strickland

Attorney Michael J. Johnson on behalf of your client Alonzo Hobbs

20. The letter then states, "I am writing to bring to your attention a matter of utmost importance, concern and urgency regarding Shelby County Assistant District Attorney [VICTIM] who has been engaging in a secret pornography career for 16+ years. [VICTIM] is involved in the

production of illegal pornography. This revelation is deeply distressing and raises serious concerns about the integrity of our judicial system, as well as the safety and well-being of our citizens. I have discovered compelling evidence (photos, videos, social media and website accounts) that clearly identify ADA [VICTIM] in the production, performance, dissemination and online sale of her pornography, and the online sale and distribution of her soiled undergarments. ...This discovery raises significant ethical concerns and brings into question the individual's fitness to serve as an assistant district attorney, whose role is to uphold justice and maintain the highest standards of professional conduct."

21. VICTIM advised all of the attorneys and clients listed in this letter were set for court in Shelby County Division 10 Court on September 6, 2023. VICTIM said that CHARLES was also set for Division 10 Court too. VICTIM said these cases were the only Special Victims Unit cases scheduled that day. VICTIM stated during that hearing the judge set CHARLES' trial date for May 6, 2024. CHARLES's attorney confirmed that both CHARLES and ROSSE were present during the hearing.

22. Forensic testing of the envelopes and letters sent regarding VICTIM revealed the presence of DNA. I request that (DNA) be collected from ROSSE for the purpose of comparing her DNA to the DNA evidence recovered from the envelopes and letters that were sent out.

III. SEARCH PROCEDURE

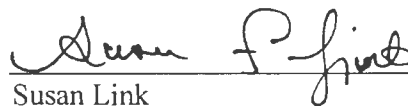
11. Swabbing the inside of a subject's mouth or cheek with a sterile cotton swab and preserving the saliva and cells obtained as a result is a reliable method for collecting a DNA sample. This process is called taking a "buccal swab" or "buccal smear." I have received training in how to collect a DNA sample and prevent contamination of the resulting evidence. I have sterile swabbing kits for use in collection and preservation.

IV. CONCLUSION

12. Based on the information above, I have probable cause to believe that collection of a DNA sample from Adrienne ROSSE could be relevant to confirming her role in sending the harassing letters regarding VICTIM. Therefore, I respectfully request this Court issue a search warrant to obtain a sample of ROSSE's DNA for subsequent testing and examination and an order to seal the documents pertaining to this matter.

I swear, under penalty of perjury, that the above is truthful and correct.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Susan Link", is written over a horizontal line.

Susan Link
Postal Inspector

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 41 by telephone, this 15th day of May, 2024.

s/Tu M. Pham

HON. TU M. PHAM
CHIEF UNITED STATES MAGISTRATE JUDGE